

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re ANGEL LUIS MACHIN RIVERA Debtor	Case Number 14-09691 (ESL 13)
--	--------------------------------------

**MOTION FOR EXTENSION OF TIME
TO FILE COMPLAINT OBJECTING
TO DEBTOR'S DISCHARGE,
TO DETERMINE DISCHARGEABILITY
OF DEBT TO PREPA, AND/OR TO OBJECT
TO THE DISCHARGEABILITY OF DEBT TO PREPA**

TO THE HONORABLE COURT:

Comes now the PUERTO RICO ELECTRIC POWER AUTHORITY, represented by the undersigned counsel, and respectfully states and prays as follows:

1. On November 24, 2014 Debtor filed the above captioned petition pursuant to Chapter 13 of the U.S. Bankruptcy Code. A confirmation hearing has been scheduled for June 3, 2015.
2. At the time of filing, the Court set a March 9, 2015 deadline to file objections to Debtor's discharge or to challenge the dischargeability of certain debts.
3. PREPA has strong reasons to believe that some of Debtor's debt to PREPA

was incurred through undue use of electric power services (e.g. altered meters, etc.) at his residence, and that therefore such part of Debtor's debt to PREPA is not dischargeable pursuant to 11 U.S.C. 523 and 1328. During and on-site inspection on the premises on which Debtor received electric power service, carried out prior to the filing of this case, PREPA personnel found that a power line had been illegally installed in such a way as to bypass PREPA's meter, which reduced substantially the measurement of electric power consumption at the premises. These premises were located at State Road 188 Km 6.6, Jagual Ward, San Lorenzo, Puerto Rico. Debtor receives electric power service at that location under residential account number 5579471000. PREPA has roughly estimated the unmeasured and therefore unbilled power service received by Debtor at \$49,600.41.

4. PREPA hereby requests a 45-day extension of time, until April 4, 2015, to file objections to Debtor's discharge or challenge the dischargeability of this debt. PREPA needs this additional time to make a final determination as to the exact amount to be charged to Debtor.

5. Counsel for Debtor has expressed to have no objection to this extension of time. The parties have also held initial conversations about the possibility of an agreement, but this will depend on the final determination as to the exact amount of the charge.

WHEREFORE, it is respectfully requested from this Honorable Court that this motion be granted and that PREPA be granted a 45-days extension of time, until April 24, 2015 to file a complaint objecting to discharge and/or to determine the dischargeability of Debtor's debt to PREPA.

NOTICE TO INTERESTED PARTIES

Within ten (10) days after service as evidenced by the certification, and an additional

three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this motion has been served or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's Office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the motion will be deemed unopposed and may be granted unless : (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFIED: That copy of this motion has been filed through the CM/ECF system, which will serve notice electronically to all counsel of record in the case.

In San Juan, Puerto Rico, this 5TH day of March, 2015.

S/ José R. Cintrón Rodríguez
JOSE R. CINTRON RODRIGUEZ
USDC-PR 204905
Litigation Division-PREPA
PO Box 363928
San Juan PR 00936-3928
Tel. 787-521-4428
Fax 787-521-4440
E-Mail: j-cintron-djur@prepa.com